**RPS Class I and Class II Regulations**
**Stakeholder Comments**
**Submitted by William Gleason, President, Chinook Energy**
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**About Chinook Energy**

Chinook Energy, a division of Chinook Sciences, is a waste-to-energy development company that utilizes its parent company's proprietary pyrolysis-based technology for gasifying organic waste streams and converting them into either power or liquid fuels. The gasification process does not involve incineration and Chinook Sciences has an unblemished track record of compliance with emissions standards in the U.S. and Europe. Chinook Sciences is the leader in pyrolysis gasification, having installed 17 commercial scale gasifiers throughout the world over the past nine years.

Our plans for Massachusetts include:

1. *Retrofitting a Chinook Sciences' metal plant to generate electricity:* Chinook Sciences is the sponsor of a scrap metal plant under development in Lowell, MA, which will gasify low value scrap metal producing clean, higher value scrap metal that can be directly re-melted. We are contemplating adding a steam boiler, turbine and generator so that we can recapture heat that is generated in this process and produce about 2 MW of electricity.
2. *Developing a 40 MW waste-to-energy plant:* Longer term, we are planning on developing a plant exclusively dedicated to producing energy from waste. We will process either municipal solid waste or industrial waste that would otherwise be landfilled.

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**Stakeholder Comments**

I would like to comment on the second question raised for Class I Regulations regarding eligible technologies or fuels. Specifically, I believe that the definition of Eligible Biomass Fuel should include most forms of landfilled waste including municipal solid waste (MSW). I base this belief on two basic reasons:

- Firstly, while it is true that landfilled waste such as MSW is not a "renewable" resource like crops, sun light or wind, it is difficult to conceive of a state of the world where we will not be generating this waste. So long as there are people populating the planet, large quantities of waste will be generated, and for the most part that waste is imposing a cost on society.

- Secondly, as a public policy matter, including landfilled waste in the definition of Eligible Biomass Fuel will create incentives that should be viewed as unambiguously desirable. Landfilling waste, particularly waste such as plastic that does not naturally decompose, damages the environment and imposes a cost on society. It can only be viewed as positive to create an incentive through public policy to divert that waste from landfills to a productive use such as producing clean energy. In fact, I would argue that it is more desirable to divert landfilled waste, for which there are no other productive uses, to the production of energy than to divert agricultural crops that are used to feed people. We are currently experiencing unintended negative consequences from government incentives around the production of biofuels. Producing clean energy from landfilled waste is a "double win" in that it reduces the quantity of waste sent to landfill and reduces our reliance on fossil fuel.

I would ask you to seriously consider including landfilled waste in the definition of Eligible Biomass Fuel. We are very serious about investing in capital equipment to allow us to produce power from such waste in Massachusetts, but without RECS it becomes an economically unattractive investment that we probably will not make.